RRTF Meeting
9-9-02

On September 9, 2002, the Agency held a meeting with the Rodenticide Registrants Task Force (RRTF) as well as a representative from Morningstar Consulting to discuss their key concerns with EPA's "Comparative Risks of Nine Rodenticides to Birds and Nontarget Mammals" document. The meeting is deemed to be another opportunity for the RRTF to expound on their criticism of the risk assessment and to provide the Agency with additional informative analysis in support of their opposition to the document, thus contending that it not be released for public comment.

The RRTF presented a slide presentation outlining their concerns regarding the ecological risk assessment. They state the following as their core concern with regard to the assessment:

> EPA's "Comparative Risks of Nine Rodenticides to Birds and Nontarget Mammals" (PRA) contains fundamental conceptual and technical errors. The document does not support the conclusions or suggested regulatory options discussed, and should not be published in its current for.

Throughout the presentation, the RRTF pointed out five major concerns with the eco. assessment. These concerns were also discussed in-depth during the June 20, 2002, meeting. Nonetheless, the following concerns were brought forth once again in order to validate the RRTF's contention that the risk assessment is fundamentally flawed and should not be opened for public comment, rather it should be withdrawn. Their top five concerns are as follows:

- The PRA is a Hazard Assessment not a Risk Assessment. Hazard Assessment cannot be used for determining mitigation measures or making regulatory decisions.
- The Decision Table Analysis methodology provides only a ranking of relative hazard and thus cannot be used to evaluate true hazard or true risk of the rodenticides being evaluated.
- The PRA contains serious technical errors that, if corrected, should materially change the Risk Conslusions.
- The PRA does not adequately consider formulated products or label use patterns that should be key elements in any risk assessment.
- Any liver residues are considered adverse effects in the PRA, but low-level residues are not definitive evidence of a causative agent, are only markers of exposure, and should be carefully interpreted.

The Agency agreed to take another look at the risk assessment and make sure that all the concerns addressed here have been taken into consideration and any needed changes to the document would be implemented, accordingly.